



June 30, 2020

VIA ECF

Hon. Naomi Reice Buchwald
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Uzoegwu v. Mnuchin et al.*, No. 20 Civ. 3264 (NRB)

Dear Judge Buchwald,

As Your Honor is aware we represent the plaintiff and putative class in the above captioned matter.

Pursuant to Your Honor's Individual Rules of Practice (2)(B), Plaintiff is responding to Defendants' request for a pre-motion conference (ECF Dckt. No. 14).

While Plaintiff does not oppose a conference, Plaintiff does request: (i) 60 days to confer with opposing counsel on this matter (both parties have not had the opportunity to discuss this case and the similar cases taking place across the country); and (ii) to have any conference via telephonic or virtual means.

We thank Your Honor for your consideration in this matter.

Respectfully Submitted,

DEREK SMITH LAW GROUP, PLLC

/s/ Alexander G. Cabeceiras

Alexander G. Cabeceiras, Esq.